

SUMMONS - CIVIL

JD-CV-1 Rev. 4-16

C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a,
52-48, 52-259, P.B. §§ 3-1 through 3-21, 8-1, 10-13**STATE OF CONNECTICUT
SUPERIOR COURT**

www.jud.ct.gov

**See other side for instructions**

- ☐ "X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.
- ☒ "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.
- ☐ "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer; BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350) 1061 Main Street, Bridgeport, CT 06604		Telephone number of clerk (with area code) (203) 579-6527	Return Date (Must be a Tuesday) April 18, 2017 Month Day Year
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	<input type="checkbox"/> G.A. Number: Bridgeport	At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349) Bridgeport	
		Case type code (See list on page 2) Major: T Minor: 90	

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code) Faxon Law Group, LLC, 59 Elm Street, New Haven CT 06510		Juris number (to be entered by attorney only) 421593
Telephone number (with area code) (203) 624-9500	Signature of Plaintiff (If self-represented)	

The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Email address for delivery of papers under Section 10-13 (if agreed to) jfaxon@faxonlawgroup.com
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Number of Plaintiffs: **2** Number of Defendants: **2** ☐ Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)	
First Plaintiff	Name: Barron, Edward, Conservator of the Person and Estate of D.T. Address: 34 Jerome Ave, Suite 120, Bloomfield CT 06002	P-01
Additional Plaintiff	Name: Conetta, Jonathan Address: 59 Kohanza Street, Danbury CT 06811	P-02
First Defendant	Name: Bemer, Bruce J. Address: 215 Sherwood Drive, Glastonbury CT 06033	D-01
Additional Defendant	Name: Trefzger, William, Inmate # 181234 Address: Bridgeport Correctional Center, 1106 North Avenue, Bridgeport CT 06604	D-02
Additional Defendant	Name: Address:	D-03
Additional Defendant	Name: Address:	D-04

Notice to Each Defendant

- 1. YOU ARE BEING SUED.** This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
- To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
- If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
- If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
- If you have questions about the Summons and Complaint, you should talk to an attorney quickly. **The Clerk of Court is not allowed to give advice on legal questions.**

Signed (Sign and "X" proper box) 	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left Joel T. Faxon	Date signed 04/05/2017
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If this Summons is signed by a Clerk:

- The signing has been done so that the Plaintiff(s) will not be denied access to the courts.
- It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law.
- The Clerk is not permitted to give any legal advice in connection with any lawsuit.
- The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.

For Court Use Only

File Date

I certify I have read and understand the above:	Signed (Self-Represented Plaintiff)	Date	Docket Number
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RETURN DATE: APRIL 18, 2017 : SUPERIOR COURT

EDWARD BARRON, CONSERVATOR OF THE
PERSON AND ESTATE OF D.T.
AND JONATHAN CONETTA

PLAINTIFFS

V.

J.D. OF FAIRFIELD
AT BRIDGEPORT

BRUCE J. BEMER and WILLIAM TREFZGER

DEFENDANTS

APRIL 5, 2017

COMPLAINT

AS TO BRUCE BEMER AND WILLIAM TREFZGER

COUNT ONE: (Violation of General Statutes § 42-110a et seq.)

1. The plaintiffs are Edward Barron, as the Conservator of the Person and Estate of D.T. and Jonathan Conetta.

2. At all times mentioned herein, the plaintiffs were citizens of Connecticut who were afflicted with serious mental and emotional illness.

3. The defendants are individuals who engaged in a continuous course of depraved and corrupt business activity over many years, targeting mentally disabled individuals for sexual exploitation, and willingly engaged in a conspiracy to sexually traffic individuals, including the plaintiffs, throughout the State of Connecticut, for financial gain and/or depraved sexual gratification in lieu of or in addition to financial gain.

4. On various dates, as set forth in the warrant affidavits, attached hereto as Exhibits 1, 2 & 3, and incorporated herein, the defendants engaged in a pattern of illegal and prohibited racketeering activity for purulent sexual purposes in violation of the

Connecticut Corrupt Organizations and Racketeering Activity Act (CORA) (General Statutes § 53-393 et seq.). Upon information and belief, the defendants, or members of their racketeering conspiracy, knowingly received proceeds from sexual racketeering and invested those proceeds in the establishment or operation of illicit enterprises or in real or personal property.

5. As set forth above, the defendants, in violation of CORA, engaged in racketeering activity, including committing, attempting to commit, conspiring to commit, or intentionally aiding, soliciting, coercing, or intimidating the plaintiffs and others to commit extortion, drug offenses, assault, prostitution, including a violation of General Statutes § 53a-83(c)(2)(A) and/or coercion in violation of General Statutes § 53-394(a).

6. As set forth above, the defendants, in violation of CORA, engaged in a pattern of racketeering activity including engaging in at least two incidents of racketeering activity that (1) have the same or similar purposes, results, participants, victims, or methods of commission or otherwise are interrelated by distinguished characteristics; (2) are not isolated incidents, all in violation of General Statutes § 53-394(e).

7. At all times mentioned herein, the defendants, or members of their racketeering conspiracy, were engaged in the conduct of a trade or commerce as defined in the Connecticut Unfair Trade Practices Act ("CUTPA"), General Statutes § 42-110a et seq.

8. The acts of defendants, or members of their racketeering conspiracy, as set forth above, were oppressive, immoral, unscrupulous and in violation of public policy, including that set forth in CORA and General Statutes § 53a-83(c)(2)(A),

amounting to an unfair trade practice in violation of CUTPA, General Statutes § 42-110b et seq.

9. The despicable acts of defendants, or members of their racketeering conspiracy, have resulted in ascertainable loss to the plaintiffs, including bodily invasion, sexual abuse, drug provision and addiction and exploitation of their pre-existing mental and emotional disabilities that left them susceptible and as targets of the defendants' perverse criminal racketeering scheme.


AD DAMNUM

WHEREFORE, the plaintiffs seek:

1. Punitive Damages pursuant to General Statutes § 42-110a et seq.;
2. Attorneys' Fees and Costs pursuant to General Statutes § 42-110a et seq.;
3. Money Damages; and,
4. Such other relief as the Court deems just and appropriate.

This matter is within the jurisdiction of this court.

The Applicant-Plaintiffs

BY 

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EXHIBIT B